

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE**

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**MARY PHILLIPA SLEDGE, MARY JANE  
PIDGEON SLEDGE TRUST, and PIDGEON SLEDGE FAMILY  
LIMITED PARTNERSHIP**

**Plaintiffs,**

**v.**

**Civ. 2:13-cv-2578**

**INDICO SYSTEM RESOURCES, INC. and  
CLEAL WATTS, III**

**Defendants.**

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**NOTICE OF PROPOSED CONSENT ORDER REGARDING PLAINTIFFS'  
MOTION TO COMPEL DISCOVERY**

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Plaintiffs hereby give notice that the Parties to this action have reached consent on a proposed order compelling discovery by Defendants arising from Plaintiffs' Motion to Compel Discovery. (ECF No. 110).<sup>1</sup>

Respectfully Submitted,

/s/ Darrell N. Phillips

**PIETRANGELO COOK PLC**

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**Attorneys for Plaintiffs**

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<sup>1</sup> A copy of the proposed Consent Order is attached hereto in pdf format and an additional copy shall be sent to the Court in Word format for the Court's review.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 28th day of October 2015, a copy of the foregoing electronically filed document was served on the parties listed below via first class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party.

Randall Fishman  
Richard Townley  
Ballin, Ballin & Fishman  
200 Jefferson Ave., Suite 1250  
Memphis, TN 38103

/s/ Darrell N. Phillips

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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MARY PHILLIPA SLEDGE, MARY  
JANE PIDGEON SLEDGE TRUST, and  
PIDGEON SLEDGE FAMILY LIMITED  
PARTNERSHIP,

Plaintiffs,

v.

Case No. 2:13-cv-2578-STA-cgc

INDICO SYSTEM RESOURCES, INC. and  
CLEAL WATTS, III,

Defendants.

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**CONSENT ORDER GRANTING PLAINTIFFS' MOTION TO COMPEL  
DEFENDANTS TO PRODUCE DISCOVERY MATERIALS**

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It appearing to the Court, upon the signatures of counsel for the parties below, that Plaintiffs' Motion to Compel Defendants to Produce Discovery Materials (ECF No. 110) is well-taken and should be granted and that Defendants shall produce to Plaintiffs the following materials within sixty (60) days of entry of this Order or face sanctions including, but not limited to, default judgment:

1. All tax returns and tax-related documents filed by or received by Defendants, that are obtainable by the Defendants through reasonable means, (including those filed for Secured Assets Management Inc.) between 2005 and 2015 as further described in Plaintiffs' Motion and corresponding Memorandum (ECF No. 110);

2. Any information related to the advent, management or control of the Guaranty Trust Bank (SL) account to which Defendants have wired Plaintiffs' money and any documents related thereto, and if no information is available, a sworn statement to that effect; and

3. All emails in Defendants' possession, custody or control relating to the following email addresses: clealii@usisr.com, isrdwc@usisr.com, clealii@indicopublic.com, sk@usisr.com, and clealii@gmail.com.

It is hereby, ORDERED, ADJUDGED AND DECREED, that Plaintiffs' Motion is GRANTED, and that Defendants shall provide the materials sought within sixty (60) days of entry of this Order.

IT IS SO ORDERED.

s/\_\_\_\_\_  
CHARMIANE G. CLAXTON  
UNITED STATES MAGISTRATE JUDGE

APPROVED AS TO FORM AND FOR ENTRY:

Dated: October 28, 2015

/s/ Darrell N. Phillips\_\_\_\_\_  
Anthony C. Pietrangelo BPR # 15596  
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*Attorney for Plaintiffs*

Dated: October 28, 2015

/s/ Richard Townley\_\_\_\_\_  
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*Counsel for Defendants*

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/s/ Darrell N. Phillips